



**Federal Fiscal Year (FFY2013) Mini Action Plan Amendment
for
Hilltop Redevelopment Project
(Burgess Mill Station)
Howard County, Maryland
February 27, 2014**

Section 92.212 of the HOME Program Final Rule authorizes HOME Participating Jurisdictions (PJ's) to incur costs known as "Pre-award costs" prior to its grant award by complying with the processes described in that section. In doing so, the PJ must publish a "Mini Action Plan" describing the proposed project, associated costs and other related matters.

Project Summary

In September 2011, Howard County, Maryland prepared a mini Action Plan to inform citizens of its intent to utilize HOME program funds in the amount of \$1,600,000 in support of the Hilltop Redevelopment project (now known as Burgess Mill Station), located at Mount Ida Drive, Ellicott City, Maryland. The County's Mini Action Plan for this project was previously approved by the U.S. Department of Housing and Urban Development (HUD) in November 2011 and project construction began in early 2012.

Phase I of the redevelopment included the demolition of the existing Hilltop residential units followed by the new construction of 198 units along with the construction of the new Roger Carter Recreation Center. Construction of Phase I is nearing completion with Hamel Green Construction serving as the General Contractor. Phase II will include the demolition of the existing Roger Carter Center and Ellicott Terrace apartments which will be replaced with a total of 75 additional residential units. The original estimated project cost was presented at \$37,000,000. Once completed, the redeveloped community will be owned by the Howard County Housing Commission and managed by Humphrey Management.

Consistency with the Consolidated Plan

Howard County affirms that the proposed project and the use of HOME funds is consistent with its approved FFY2011- FFY2015 Consolidated Plan Objective to provide decent affordable housing and suitable living environments. The corresponding goal, Goal #1, is to expand opportunities for diverse and affordable housing options that are available for all income levels at or below 80% of AMI with the outcomes of affordability, availability/accessibility. The County's estimated output for this Goal is the development of a mixed-income community containing approximately 273 residential units. Other sources of funding for this project include low-interest/deferred loans and Low Income Housing Tax Credits (LIHTC) and State Bond financing. Additionally, the Housing Authority of Baltimore City (HABC) / Metropolitan Baltimore Quadel (MBQ) administered Special Mobility Program will be included in this project.

Estimated HOME Program Funding

In its September 2011 Mini Action Plan, Howard County anticipated using current year (FFY2011) funds and pre-incurring costs under its FFY2012 -FFY2016 entitlement grant awards. The County originally proposed the funding strategy below, excluding Administrative funds, American Dream Down Payment Initiative (ADDI), for applicable years, and Community Housing Development Organization (CHDO) set-aside funds.

Grant Award Year	Amount Available for Commitment	Notes
FFY2011	\$198,155.00	
FFY2012	\$334,258.00	This amount represents 75% of the <i>projected</i> entitlement award less Administrative and CHDO set-aside funding and reflects the maximum amount that is expected to be permitted by HUD as pre-award costs for this project from the FFY12 grant year.
FFY2013	\$334,258.00	This amount represents 75% of the <i>projected</i> entitlement award less Administrative and CHDO set-aside funding and reflects the maximum amount that is expected to be permitted by HUD as pre-award costs for this project from the FFY13 grant year.
FFY2014	\$334,258.00	This amount represents 75% of the <i>projected</i> entitlement award less Administrative and CHDO set-aside funding and reflects the maximum amount that is expected to be permitted by HUD as pre-award costs for this project from the FFY14 grant year.
FFY2015	\$334,258.00	This amount represents 75% of the <i>projected</i> entitlement award less Administrative and CHDO set-aside funding and reflects the maximum amount that is expected to be permitted by HUD as pre-award costs for this project from the FFY15 grant year.
FFY2016	\$64,813.00	This amount represents the <i>projected</i> balance of entitlement award funds that will be needed to complete the HOME funding pre-award costs for this project.
Total HOME Commitment	\$1,600,000	

In January 2013, the County acknowledged a reduction in its HOME entitlement award for Program year FFY 2012 and amended its previously approved Mini Action Plans for FFY 2013-2016 and included a new Mini Action Plan year for FFY 2017 to account for this change.

The County projected that FFY2012, FFY2013, FFY2014, FFY2015 and FFY2016 HOME program funding for the Hilltop Redevelopment project would be approximately \$233,979.75 annually, a reduction from the original proposed amount of \$334,258 annually. Additionally, the County needs to increase the originally proposed amount for FFY2016 from \$64,813 to \$233,979.75 with a final *projected* pre-award amount of \$93,546.66 required for FFY 2017 allocation.

Revised HOME Funding

The County received a greater amount of HOME funds in FFY 2013 than projected which requires amendments to its previously approved Mini Action Plans for FFY 2014-2017.

The total amount of HOME funds allocated for the project shall remain at \$1.6 million as proposed in the September 2011 Mini Action Plan. The revised pre-award funding strategy is as follows:

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Grant Award Year	Amount Available for Commitment	Notes
FFY2014	\$239,947.50	This amount represents 75% of the <i>projected</i> entitlement award less Administrative and CHDO set-aside funding and reflects the maximum amount that is expected to be permitted by HUD as pre-award costs for this project from the FFY14 grant year.
FFY2015	\$239,947.50	This amount represents 75% of the <i>projected</i> entitlement award less Administrative and CHDO set-aside funding and reflects the maximum amount that is expected to be permitted by HUD as pre-award costs for this project from the FFY15 grant year.
FFY2016	\$239,947.50	This amount represents 75% of the <i>projected</i> entitlement award less Administrative and CHDO set-aside funding and reflects the maximum amount that is expected to be permitted by HUD as pre-award costs for this project from the FFY16 grant year.
FFY2017	\$208,075.25	This amount represents the <i>projected</i> balance of entitlement award funds that will be needed to complete the HOME funding pre-award costs for this project.
Total HOME Commitment	\$1,600,000	

Mini Action Plan Subject To HUD Approval

Howard County has received HUD approval for its original pre-award funding for Hilltop Redevelopment. In accordance with Section 92.212(c) of the HOME Program Final Rule, since the proposed amounts listed in the above chart for FFY16-FFY17 are in excess of 25% of the County's current year HOME allocation; both the amended and the new Mini Action Plan is subject to approval by the HUD Baltimore Office.

Funding Subject to Future Availability of HOME Funds

Howard County acknowledges that it is undertaking this project at its own risk and the planned use of HOME funding for the remaining approved pre-award years FFY2014 – FFY2017 is subject to the future availability of HOME funding as appropriated annually by Congress.

Inclusion of Project in Full Action Plan

Howard County acknowledges its responsibility to ensure that all future year Action Plans for FFY14 through FFY17 reflect the proposed use of HOME funds for the Hilltop Redevelopment Project as detailed in this Mini Action Plan.

HOME Program Requirements

The Hilltop Redevelopment project does not involve any forms of investment not described at paragraph 92.2059b) of the HOME Program Final Rule. [consolidated Plan Final Rule 91.220(1)(2)(i)]

The Project does not involve homeownership. Consequently, this submission does not include the County's guidelines for homeownership recapture or resale. [92.220(1)(2)(iii)]

The County does not intend to use HOME funds to refinance existing debt in this project therefore this submission does not include ADDI information. [91.220(1)(2)(iv)]

Compliance with Citizen Participation Plan Requirements

Consistent with paragraph 91.105(b)(2), Howard County will publish this plan in the following manner: The proposed amendments to existing Mini Action Plans and the proposed new Mini Action Plan will be published one time in the Howard County Times and Columbia Flier on Thursday, February 27, 2014. This Plan can also be viewed on the Howard County Housing webpage at <http://countyofhowardmd.us/Departments.aspx?ID=2232>. Copies will be available at the Howard County Main Branch library and at the Howard County Housing office located at 6751 Columbia Gateway Drive, Third Floor, Columbia, MD 21046, Monday through Friday, 8 am to 5 pm.

The required 30-day review and comment period for the Plan **will begin on Friday, February 28, 2014 and conclude on Monday, March 31, 2014**. Comments on the proposed amended and new Mini Action Plans should be provided in writing to Ms. Shirelle M. Bennett, Deputy Director, Howard County Housing, 6751 Columbia Gateway Drive 3rd Floor, Columbia, Maryland 21046. Howard County will consider any comments received in writing by March 31, 2014 in preparing the final version of this Mini Action Plan to be submitted to HUD. A summary of any such comments or views and a summary of any comments and views not accepted and the reasons therefore will be attached to the final version of this Mini Action Plan. The final version of this Mini Action Plan will be available to the public at the following address: Howard County Housing, 6751 Columbia Gateway Drive 3rd Floor, Columbia, Maryland 21046. To request a copy of the final version, please contact Rebekah King, HOME Program Specialist, at 410-313-6329 or by way of email at rdking@howardcountymd.gov.

Certifications

Consolidated Plan and HOME Program Certifications will be included with the final version of this document to be submitted to HUD.

This document will be made available in alternative formats upon request.